

to pass the necessary laws to implement those agreements. That is the procedure which has been in effect here and in Great Britain for many, many years. Instead of doing that with respect to these tax agreements, the Government comes to us and dumps the whole agreement into our laps and asks us to make the agreement law. Now, the agreement is phrased in the language of agreements, and, as such, is the language of negotiation and compromise. It is not couched in the language of statutes, the kind of material which people read in order to understand their rights and obligations.

It is almost an impossibility for the ordinary citizen to read the law in this expanded form and understand the tax law as affecting himself as a result of agreements between Canada and other countries. I do not wonder that the honourable Leader of the Government (Hon. Mr. Haig) passed the task of explaining the bill to the honourable senator from Toronto (Hon. Mr. Hayden), who has made an intensive study of the provisions of previous tax agreements. I fancy he is the only person amongst us who could answer questions on this subject expeditiously. The agreement is a mass and tangle of words, words, words.

I am not going to vote against the bill. It is in the form that the authorities have adopted in the past, and which I suppose they will follow in the future, but may I express the hope that when our tax authorities have entered into all the agreements desired, and we, under the compulsion of the circumstances, have ratified them, serious consideration will be given to my proposal to turn them all into a uniform statute. Let us carry out the terms of these agreements, but let us do so by the enactment of a statute common to all these countries. Let us codify and clarify this tangle of law.

**Hon. Mr. Farris:** Would that not breach the agreement?

**Hon. Mr. Roebuck:** No, not at all. These agreements are all entered into on the understanding that the Crown must get the consent of Parliament before they become law. How they become law is not a matter for the other country to consider. The other party's concern is only that the substance of the agreement becomes law. I have no objection to making the substance of this agreement into law; I do not like the method we are adopting to do so.

**Hon. Mr. Farris:** But I understand that the agreements vary.

**Hon. Mr. Roebuck:** They vary somewhat, and perhaps the statute would have to show

the differences as between the various countries, but, in those agreements where the terms are identical the statute could apply to all of them. Where you have made some exceptions you might have to add a paragraph. I trust that this proposal will be seriously considered by our law-making body.

**Hon. Mrs. Fergusson:** Honourable senators, I should like to pursue my first question and ask the Leader of the Government (Hon. Mr. Haig) if he can tell me why the provision regarding students has been dropped from this agreement, when it was contained in the one with Denmark a couple of years ago.

**Hon. Mr. Haig:** I cannot answer that. The agreement with Australia was drawn by the minister and was agreed upon. I think the number of students going either way is very few, anyway.

**Hon. A. K. Hugessen:** Honourable senators, the discussion on this bill has very distinct echoes of the discussion which took place on the bill implementing the agreement with Denmark in 1956. As most of the other honourable senators who expressed their views at that time have already spoken on this bill, I am going to contribute my little piece.

The way I look at legislation of this character is that, regardless of any holes we may pick in any details of the particular agreement which we are discussing and which we are asked to approve, the general purport of the bill is relief from double taxation, and to the extent to which it does relieve the citizens in both countries from double taxation I think it should be warmly encouraged. The only objection which some honourable senators might raise is that it does not go far enough. Well, as has been explained this afternoon, in the form in which this legislation comes to us we can do only one of two things. We can either reject it or accept it. We cannot amend it. If we accept it, even if we consider it to be insufficient, we to that extent benefit those residents of Canada who carry on business in Australia, and equally those residents of Australia who carry on business in this country.

I read over the provisions of this agreement and I noticed, as other honourable senators noticed, and as in particular the honourable senator from Fredericton (Hon. Mrs. Fergusson) noticed, that it omitted a provision which was contained in the Denmark agreement, and I think in some of the other agreements which we have approved in this house, that residents of one country who go to the other country for purposes of education are exempted from tax in that other country in respect of income from their home country during the period they are